



PAT MCCRORY
Governor

DONALD R. VAN DER VAART
Secretary

MICHAEL SCOTT
Director

Solid Waste Section

June 17, 2016

Mr. Eric Evans, Manager
Edgecombe County
P.O. Box 10
Tarboro, NC 27886

Re: Comment on the Revised Permit Amendment Application
Edgecombe County Construction and Demolition Debris (C&D) Landfill
Edgecombe County, North Carolina
Permit No.3301-CDLF-1997, Document ID No. (DIN) 26274

Dear Mr. Evans:

The Solid Waste Section (the SWS) has completed a review of the revised permit amendment application (DIN 26114) for the above-referenced C&D Landfill, dated August 2014 and revised May 2016. Few comments that stated below are required your prompt responses.

Facility Plan

1. The Section A- Facility Plan of the permit application (Page # 2) requests the SWS for an approval of issuing a 10-year permit to continue operating the Edgecombe County C&D Landfill, Permit No. 33-01-CDLF-1997. **The SWS denies this request but may issue Edgecombe County (the County) a 5-year Permit To Operate for a continued operating the Edgecombe County C&DLF – Phases 1, 2, 3, & 4.** This permit decision is made based on the following considerations:
 - a. The Corrective Action Plan (CAP) is not completed and the CAP effectiveness is subjected to revaluation. The CAP (DIN 9206) and the amendment (DIN 11254) that were originally approved in January 2009 and August 2010, respectively. The proposed hydraulic barrier wall (a major component of the CAP has not been constructed) is scheduled to construct in December 2017 according to the approved Interim Corrective Action Evaluation Report dated May 24, 2016 (DIN 26122). The issuance of a 5-year permit will allow the SWS to assist the County in implementation and completion of the hydraulic barrier wall.
 - b. The permit fee associated with a 10-year permit of a C&D landfill shall be \$18,000.00 dollars. The County has paid the 5-year permit fee of \$9,000 on September 29, 2014. The current permit of the landfill has expired on March 31, 2015. The new 5-year permit, if approved and issued, will (i) allow the County

regain the valid current permit status which makes the County is legible to obtain a Life-Of-Site Permit when the new permit expires on March 31, 2020 and (ii) save the County not to pay for additional fee.

- c. According to the Facility Plan the 5-year permit for the C&D Landfill – Phases 1, 2, 3, & 4 will have available waste capacity of 182,867 cubic yards which has the service life more than 5 years.

Please revise the Section A- Facility Plan (page #2) accordingly.

Water Quality Monitoring Plan (Appendix II-C)

2. The following monitoring wells should also be functioned as Corrective Measures: MW-5 and MW-12. Please revised the summary table in Section 2.2.1.3 on Page 11 of the Water Quality Monitoring Plan.

Financial Assurance

3. The revised financial assurance (FA) document are provided in the Section D-8 & Appendix XI-E, and the revised cost estimates of the closure and post-closure activities are stated in Section E of the permit application. It is evident that the April 29, 2016 FA provided by the County is not sufficient. The side-by-side cost comparison is summarized in the following table:

County FA Letter 04/29/2016		Permit Application (DIN 26114)		
Item	Amount	Item	Amount	Reference
Closure Cost	870,806	Closure Cost	1,290,727	Appendix III-E
Post-Closure Cost	2,044,626	Post-Closure Cost	2,245,294	Appendix V-E
Corrective Measures	2,342,000	Corrective Measures	1,782,737.5	Section D-5
PACA	-	PACA	2,000,000	NCGS 130A-295.2(h)
Total	5,257,432		7,318,758	

Please revised the FA document accordingly. Please also submit the copy of the FA letter to Ms. Sarah Rice who can be reached at 919-707-8287 or sarah.rice@ncdenr.gov, and 1646 Mail Service Center, Raleigh, NC 27699-1646.

Drawings

4. Phase 9 of the C&D Landfill is proposed in the Facility Plan and showed on the cross-section drawing, Drawing 7 of 13, in Section C – Operation and Waste Acceptance Plan. However, the Phase 9 waste footprint is not available on any other plan drawings. Please add the Phase 9 to the applicable drawings throughout the permit application document.

The County should submit the SWS a hard copy of the revised portions of the application document including the responses to the above-mentioned comment and drawings and one electronic copy of the entire revised permit application. If you have any questions please contact me at 919-707-8251 ming.chao@ncdenr.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Chao', with a stylized, cursive script.

Ming-Tai Chao, P.E.
Division of Waste Management, NCDEQ

cc:

Samuel P. Watts P.G., S&ME
Ervin Lane DWM
Sarah Rice, DWM
Central Files

Ed Mussler, P.E, Permitting Branch Supervisor
John College, DWM
Drew Hammonds, DWM